

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RENALDO HASSELL,

Plaintiff,

-vs-

CITY OF CHICAGO and
CHICAGO POLICE OFFICERS
P. STANTON, #9412,
K.M. ZIA, #7234,

Defendants.

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) No. 08 CV ____

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) (*jury demand*)

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) FILED: NOVEMBER 1, 2008

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) 08 CV 6270

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) JUDGE NORGLER

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) MAGISTRATE JUDGE DENLOW

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) YM

COMPLAINT

Plaintiff, by counsel, allege as follows:

1. This is a civil action arising under 42 U.S.C. §1983. The jurisdiction of this court is conferred by 28 U.S.C. §1343.
2. Plaintiff Renaldo Hassell is a resident of the Northern District of Illinois.
3. Defendant City of Chicago is an Illinois municipal corporation joined in this action as the potential indemnifier of the individual police officers.
4. Defendants P. Stanton #9412 and K.M. Zia #7234 were at all times relevant acting under color of their authority as Chicago police officers.
5. On February 7, 2008, defendants Stanton and Zia arrested plaintiff and caused plaintiff to be charged with a criminal offense. Defendants Stanton and Zia did not have a lawful basis on which to make this arrest; after making the arrest, defendants Stanton and Zia prepared false police reports and fabricated evidence that would be used to hold plaintiff in custody

and to be charged with a criminal offense.

6. Thereafter, defendants Stanton and Zia concealed defendant's innocence of any criminal wrongdoing from the prosecutors.
7. Plaintiff remained in custody from the date of his arrest to October 15, 2008 when all charges against him were dismissed in a manner consistent with his innocence.
8. As the direct and proximate result of the above described acts, plaintiff was deprived of rights secured by the Fourth and Fourteenth Amendment to the Constitution of the United States.
9. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in his favor and against defendants in an amount in excess of one hundred thousand dollars as compensatory damages.

/s/ Kenneth N. Flaxman

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